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August 4, 2022

BY EMAIL

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Re: *United States v. Bill Hwang and Patrick Halligan, 22 Cr. 240 (AKH)*

Dear Counsel:

Pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure and your respective requests for the voluntary production of certain additional information, we have prepared hard drives containing the categories of files identified below. Except where specifically noted otherwise, the discovery material provided herein are designated as Protected Information subject to the terms of the protective order entered in this matter.

The hard drives produced today contain the following materials:

- 1) Load-ready digital files and native exports obtained from execution of search warrants on various email, Bloomberg, iCloud, and Google accounts. SDNY_SWR_PROD001, SDNY_SWR_PROD002, SDNY_SWR_PROD003.

| Bates Ranges | Producing Party |
|--------------------------------|---|
| SDNY_SWR_0000000001-0000343756 | Responsive Bloomberg Search Warrant Returns (21 Mag 9335) |
| SDNY_SWR_0000343757-0000344924 | Responsive Apple Search Warrant Returns (21 Mag 9335) |
| SDNY_SWR_0000344925-0000350171 | Responsive Google Search Warrant Returns (21 Mag 9335) |
| SDNY_SWR_0000350172-0001305766 | Responsive Microsoft Search Warrant Returns (21 Mag 9335) |
| SDNY_SWR_0001305767-0001305768 | Responsive Apple Search Warrant Returns (21 Mag 9335) |
| SDNY_SWR_0001305769-0001305949 | Responsive Google Search Warrant Returns (21 Mag 9335) |

| | |
|--------------------------------|---|
| SDNY_SWR_0001305950-0001476215 | Responsive Microsoft Search Warrant Returns (21 Mag 9335) |
| SDNY_SW_00000000005 | Responsive Hwang iCloud Cellebrite Export – PDF and UFDR Format (Password: ACM2022) |

- 2) Load-ready and native digital files obtained through consent search and search warrants executed on devices possessed by William Tomita. SDNY_WT_PROD001.

| Bates Ranges | Producing Party |
|-------------------------------|--|
| SDNY_WT_0000000001-0000028207 | William Tomita iPhone XS (Serial C39YM156KPFV) Files |
| SDNY_WT_0000028208-0000073353 | William Tomita iPad Pro (Serial DMPWJ463HP50) Files |
| SDNY_WT_0000073354-0000092715 | William Tomita iPhone 11 Pro (Serial C39CV5J1N6XW) Files |
| SDNY_SW_00000000001 | William Tomita iPad Pro (Serial DMPWJ463HP50) Cellebrite Report |
| SDNY_SW_00000000002 | William Tomita iPhone 11 Pro (Serial C39CV5J1N6XW) Cellebrite Report |
| SDNY_SW_00000000003 | William Tomita iPhone XS (Serial C39YM156KPFV) Cellebrite Report |
| SDNY_SW_00000000004 | William Tomita – Grace and Mercy iPhone (Serial DX3FP03J0DXW) Responsive Cellebrite Report |

- 3) Supplemental subpoena returns and materials obtained from civil regulators, including cover letters. SDNY_P003_PROD001, SDNY_P004_PROD001.

| Bates Ranges | Producing Party |
|---|--|
| SDNY_P003_0000000001-0000000544, SDNY_P004_0000000001-0000000013 | Cover Letters and Other Supporting Documentation from Various Producing Parties Provided to the U.S. Securities and Exchange Commission (“SEC”) and U.S. Commodity Futures Trading Commission (“CFTC”) |
| SDNY_P004_0000000014-0000003262 | Documents Produced by Archegos |
| SDNY_P004_0000003263 | Documents Produced by Joshua Chuang |
| SDNY_P004_0000003264 | Documents Produced by Sterling Clay |
| SDNY_P004_0000003265-0000003272 | Documents Produced by Deutsche Bank |
| SDNY_P004_0000003273 | Documents Produced by Jensen Ko |
| SDNY_P004_0000003274-0000003276 | Documents Produced by Nomura |
| SDNY_P004_0000003277 | Documents Produced by David Park |
| SDNY_P004_0000003278-0000125763 | Documents Produced by Archegos |

| | |
|---------------------------------|---|
| SDNY_P004_0000125764-0000125767 | Documents Produced by Caroline Swenson |
| SDNY_P004_0000125768-0000125785 | Documents Produced by Felicity Tan |
| SDNY_P004_0000125786 | Documents Produced by UBS |
| SDNY_P004_0000125787-0000125865 | Documents Produced by BMO |
| SDNY_P004_0000125866-0000131906 | Documents Produced by Bank of America |
| SDNY_P004_0000131907-0000133648 | Documents Produced by Caroline Swenson |
| SDNY_P004_0000133649-0000133803 | Documents Produced by Deutsche Bank |
| SDNY_P004_0000133804-0000136726 | Documents Produced by David Eun |
| SDNY_P004_0000136727-0000308684 | Documents Produced by Grace and Mercy |
| SDNY_P004_0000308685-0000371900 | Documents Produced by Goldman Sachs |
| SDNY_P004_0000371901-0000428906 | Documents Produced by Jefferies |
| SDNY_P004_0000428907-0000431046 | Documents Produced by Mizuho |
| SDNY_P004_0000431047-0000435393 | Documents Produced by Morgan Stanley |
| SDNY_P004_0000435394-0000435395 | Documents Produced by Nomura |
| SDNY_P004_0000435396-0000436003 | Documents Produced by Morgan Stanley |
| SDNY_P004_0000436004-0000446621 | Documents Produced by Teng Yue Partners |
| SDNY_P004_0000446622-0000447658 | Documents Produced by UBS |

4) Native electronic materials from various sources. SDNY_003.

| Bates Ranges | Producing Party |
|----------------------------|--|
| SDNY_003_00000001 | ACM March 2021 Combo Sheet, obtained by SEC (password: perf) |
| SDNY_003_00000002-00000004 | Trading records relating to certain individual ACM employees, obtained by SEC |
| SDNY_003_00000005-00000022 | ACM Letter to SEC dated April 8, 2021, describing Axeo system production values |
| SDNY_003_00000005-00000022 | March 24, 2021 Bloomberg Chat, between Halligan and Becker, obtained by SEC |
| SDNY_003_00000023-00000055 | Hard Copy Documents from Search of Becker's Residence |
| SDNY_003_00000056-00000710 | Cover Letters, Custodian of Records Certifications, and Other Supporting Documentation |

Please let us know if you encounter difficulty in accessing the files.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by:



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